

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
(at Boston)**

IN RE: NEW ENGLAND)	Master File No. 1:13-MD-2419-RWZ
COMPOUNDING PHARMACY,)	MDL Docket No. 2419
INC. PRODUCTS LIABILITY)	This Document Relates To:
LITIGATION)	
)	<i>ALL CASES</i>
)	

**STEVEN HIGGINS’S MOTION FOR A PROTECTIVE ORDER AND MOTION TO
QUASH OR MODIFY THE SUBPOENA**

Pursuant to Rules 26(c) and 45(d)(3) of the Federal Rules of Civil Procedure, non-party Steven Higgins hereby moves for entry of an Order quashing the subpoena directed to him and forbidding Defendants Saint Thomas West Hospital f/k/a St. Thomas Hospital, Saint Thomas Health, and Saint Thomas Network (collectively the “St. Thomas entities”) from taking his deposition. In the alternative, Mr. Higgins requests an Order requiring any deposition of him to be conducted by written questions pursuant to Rule 31 of the Federal Rules of Civil Procedure.

This motion is supported by the accompanying memorandum in support.

Dated: May 11, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing has been filed with the Clerk of the Court on May 11, 2015, using the CM/ECF system which sent notification of this filing to all ECF registered counsel of record via e-mail generated by the Court's ECF system.

/s/ Joshua A. Klarfeld